

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK
SWEIGERT V. GOODMAN, CIVIL CASE #: 1:18-CV-08653-VEC - JUDGE VALERIE E. CAPRONI

SDNY PRO SE OFFICE
2019 JUL 25 AM 9:49
S.D. OF N.Y.

D. G. SWEIGERT, C/O
GENERAL DELIVERY
ROUGH AND READY, CA 95975
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July 23, 2019

Jason Goodman, CEO
Multimedia Systems Designs, Inc.
252 7th Avenue, APT #6S
New York, NY 10001-7334

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U.S. District Court for the SDNY
500 Pearl Street
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SUBJECT: PROPOSED DISQUALIFICATION OF PRESIDING JUDGE –
PART TWO

REF: (a) ROBERT S. MUELLER, III (former special counsel)

(b) SWEIGERT V. GOODMAN,
CIVIL CASE #: 1:18-CV-08653-VEC
JUDGE VALERIE E. CAPRONI

Good Morning:

1. This letter is an attempt to ascertain the intentions of the defendant (Goodman) concerning a motion proposed by the plaintiff (undersigned). The purpose of the proposed motion is to examine the supporting rationale for the proposed disqualification of the current presiding judge.

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2. You may want to consult with legal counsel while you are deliberating about your decision to accept a potential waiver of conflict of interest of the presiding judge. Such a waiver would require both parties to agree to accept the apparent conflict of interest and personal bias that has been purportedly demonstrated by the presiding judge. Unless there is a clear indication of a tangible approach to mitigate the appearance of this conflict of interest the appearance of impropriety and personal bias will cast a shadow over the integrity of the Court (see below).

Canon 2: A Judge Should Avoid Impropriety and the Appearance of Impropriety in all Activities

Respect for Law. A judge should respect and comply with the law and should act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary.

Canon 3: A Judge Should Perform the Duties of the Office Fairly, Impartially and Diligently

The duties of judicial office take precedence over all other activities. The judge should perform those duties with respect for others, and should not engage in behavior that is harassing, abusive, prejudiced, or biased. The judge should adhere to the following standards:

(A) Adjudicative Responsibilities.

(1) A judge should be faithful to, and maintain professional competence in, the law and should not be swayed by partisan interests, public clamor, or fear of criticism.

(2) A judge should hear and decide matters assigned, unless disqualified, and should maintain order and decorum in all judicial proceedings.

(3) A judge should be patient, dignified, respectful, and courteous to litigants, jurors, witnesses, lawyers, and others with whom the judge deals in an official capacity. A judge should require similar conduct by those subject to the judge's control, including lawyers to the extent consistent with their role in the adversary process.

(4) A judge should accord to every person who has a legal interest in a proceeding, and that person's lawyer, the full right to be heard according to law.

Internet URL: <https://www.uscourts.gov/judges-judgeships/code-conduct-united-states-judges>

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3. As you are well aware, Larry Klayman, esq. has filed "criminal charges" against ref: (a).

Freedom Watch Founder Larry Klayman Announces Criminal Indictment Of Special Counsel Robert Mueller By Citizens Grand Jury

NEWS PROVIDED BY

Freedom Watch

Jun 27, 2019, 09:00 ET

WASHINGTON, June 27, 2019 /PRNewswire/ -- Today, Larry Klayman, a former federal prosecutor and the founder of Freedom Watch (www.freedomwatchusa.org) announced the criminal indictment of **Special Counsel Robert Mueller** by a citizens grand jury for the alleged crimes of witness tampering, obstruction of justice, attempting to suborn perjury and other illegalities. A copy of the indictment, jury instructions, verdict form and related documents can be found on Freedom Watch's website along with a video of the grand jury proceedings. Filming the proceedings **as well as offering testimony** about Mueller's alleged illegal grand jury leaks was **Jason Goodman, CEO of Crowdsourcing the truth**. The video of the proceedings can also be found at the links below:

In a landmark case styled *United States v. Williams*, 504 U.S. 36 (1992), Justice Antonin Scalia ruled that the grand jury does not belong to any of the three branches of government, but rather to the American people. Indeed, several states have citizens grand juries.

Klayman had this to say as the prosecutor who procured this indictment:

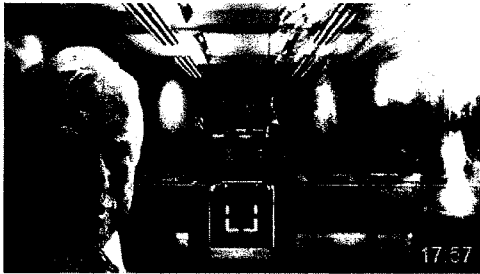
"On June 12, 2019, a citizens grand jury comprised of eight jurors heard testimony and considered other evidence principally from Dr. Jerome Corsi, who had been a target of Special Counsel Mueller's so-called Russian collusion investigation and voted out a true bill of indictment based on Mueller's primarily having threatened Corsi with indictment if he did not agree to lie under oath implicating President Donald Trump in criminal activity. In addition, the citizens grand jury indictment addresses alleged illegal and unconstitutional surveillance and criminal grand jury leaks concerning Corsi."

"This criminal indictment of Mueller is both historic and the first of its kind, particularly since it is clear that the Department of Justice, in the end, protects its own. See Solomon, "Feds Gone Wild: DOJ's Stunning Inability to Prosecute its Own Bad Actors," *The Hill* (June 13, 2019). [emphasis added]

Internet URL: <https://www.prnewswire.com/news-releases/freedom-watch-founder-larry-klayman-announces-criminal-indictment-of-special-counsel-robert-mueller-by-citizens-grand-jury-300875547.html>

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4. As you are well aware, Mr. Klayman filed a civil lawsuit against ref: (a) on behalf of his client Jerome Corsi. You have covered these court proceedings on your CSTT social media podcast show. A small sample appears below.



Dr. Corsi's Day in Court – The Only Man in America Taking on Robert Mueller

Jason Goodman

Streamed 6 months ago • 39,700 views

Larry Klayman challenges Robert Mueller's special counsel on behalf of Dr. Jerome Corsi in the opening hearing with Judge



Corsi v Mueller Legal Analysis with Special Guest Larry Klayman

Jason Goodman

Streamed 6 months ago • 69,815 views

Larry Klayman joins me to discuss yesterday's hearing with judge Richard Leon, the first in Corsi v Mueller. Support Dr. Corsi's ...



Streamed live on Jan 3, 2019

Larry Klayman challenges Robert Mueller's special counsel on behalf of Dr. Jerome Corsi in the opening hearing with Judge Leon.

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L to R; Jason Goodman and Larry Klayman

Streamed live on Jan 4, 2019

Larry Klayman joins me to discuss yesterday's hearing with judge Richard Leon, the first in Corsi v Mueller.

Support Dr. Corsi's legal defense fund – <http://corsination.com/>

Visit Larry's website – <http://www.larryklayman.com/>

Support Freedom Watch – <https://www.freedomwatchusa.org/>

5. To the casual observer it appears the three of you are inextricably intertwined in matters involving Mr. Corsi and lawsuits directed at ref: (a). The multiple personal appearances on the Crowdsourcethe Truth (CSTT) podcast social media show by Mr. Klayman and Mr. Corsi almost appears countless. This would indicate that you are very familiar with the legal strategies and approaches to this litigation (Corsi vs. ref: (a)) demonstrated by the plaintiff and his attorney. One can assume that the public relations campaign that you could construct would be helpful to the pursuit of this litigation. Thus, it could be assumed that you play a key role on the Corsi litigation team.

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JEROME CORSI, an individual
Denville, New Jersey¹

Plaintiffs.

v.

ROBERT MUELLER, an individual,
Individually and in his official capacity as Special Counsel
950 Pennsylvania Ave NW
Washington, D.C. 20530

And

UNITED STATES DEPARTMENT OF JUSTICE
950 Pennsylvania Ave NW
Washington, D.C. 20530

And

FEDERAL BUREAU OF INVESTIGATION
935 Pennsylvania Ave NW
Washington, D.C. 20530

And

NATIONAL SECURITY AGENCY
9800 Savage Rd. Suite 6272
Ft. George G. Meade MD 20755-6000

AMENDED COMPLAINT
Civil Action No. 18-cv-02885
(ESH)

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of the Defendants, which includes in excess of \$800,000,000.00 million USD in
punitive damages against Defendant Bezos's (5% of his net worth) alone.

(d) Such other relief as this Court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiffs demand a trial by jury on all counts as to all issues so triable.

Dated: January 22, 2019

Respectfully submitted,

/s/ Larry Klayman

Larry Klayman, Esq.

KLAYMAN LAW GROUP, P.A.

D.C. Bar No. 334581

2020 Pennsylvania Ave. NW, Suite 800

Washington, DC 20006

Tel: (561)-558-5536

Email: leklayman@gmail.com

6. For the above reasons, it may be prudent for you to discuss these matters with appropriate legal counsel before deciding as to whether or not you support a waiver of the purported conflict-of-interest presumably held by the presiding judge in the form of personal bias towards her former boss, ref: (a).

I hereby attest, that to the best of my ability, the foregoing information is provided under an oath as to accuracy.

Signed this 23 day of July, 2019.

D. Swert

D. G. SWEIGERT, C/O
GENERAL DELIVERY
ROUGH AND READY, CA 95975

7.23.19

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D. G. SWEIGERT, C/O
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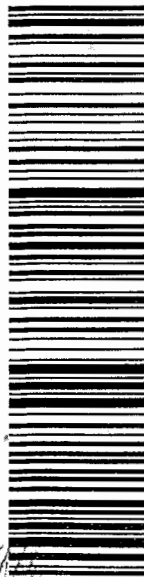
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